

MEMORANDUM
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April 27, 2023

VIA ECF

Honorable Andrew L. Carter, Jr.
United States District Court
Southern District of New York
40 Foley Square, Room 435
New York, NY 10007
ALCarterNYSDChambers@nysd.uscourts.gov

Re: United States v. Jacobs, 20 CR 660 (ALC)

Dear Judge Carter:

We write the Court requesting a modification of Mr. Jacobs's pretrial release conditions; specifically, a modification of Mr. Jacobs's travel restrictions to permit him to travel to the Dominican Republic between the date of this Court's approval, if Ordered, and June 6, 2023. Mr. Jacobs has not purchased a ticket yet out of deference to this Court's authority, and so does not have precise dates of travel, but will in any case be back by June 6, 2023 if this Court approves.

As the Court may know from prior applications, Mr. Jacobs has a business installing and servicing credit card processing machines. He works with businesses in the Dominican Republic and has taken several trips there in the past (and has always, of course, returned). Mr. Jacobs would like to attend meetings with his counterparties in the Dominican Republic. He would also like to take a few days of vacation as well. He has applied for several prior travel modifications, each expanding his range of locations he may go, including multiple prior applications for travel to the Dominican Republic, and the Court graciously granted each of those requests. Mr. Jacobs,

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in turn, has returned within the allotted time from each trip, and has scrupulously abided by all his bail conditions.

We have communicated with the Government (AUSAs Samuel Raymond and David Felton) and Pretrial Services. The Government has no objection, and Pretrial Services takes no position, which Mr. Jacobs appreciates very much.

Thank you for your consideration, and happy new year.

Respectfully submitted,



Marc Agnifilo
Zach Intrater

cc: AUSAs Samuel Raymond & David Felton (via email)
Pretrial Services Officer Viosanny Harrison (via email)

The application is **GRANTED**.
So Ordered.



5/2/23